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*Attorneys for plaintiff Steven V. Kozmary, M.D., LLC d/b/a  
Cleveland Back and Pain Management Center*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

STEVEN V. KOZMARY, M.D., LLC, d/b/a  
CLEVELAND BACK AND PAIN  
MANAGEMENT CENTER, a Nevada limited  
liability company,

Plaintiff,

v.

MEDICAL MUTUAL OF OHIO, a foreign non-  
profit corporation; DOES 1-10, business entities,  
forms unknown; DOES 11-20, individuals; and  
DOES 21-30, inclusive,

Defendants.

Case No. 2:19-cv-01819-JCM-EJY

**JOINT STIPULATION AND REQUEST FOR  
EXTENSION OF TIME TO FILE  
OPPOSITION TO DEFENDANT MEDICAL  
MUTUAL OF OHIO'S MOTION TO  
DISMISS FOR LACK OF PERSONAL  
JURISDICTION**

Plaintiff Steven V. Kozmary, M.D., LLC and defendant Medical Mutual of Ohio (collectively, the “Parties”), by and through their undersigned counsel of record, hereby stipulate and request that the deadline for plaintiff Steven V. Kozmary, M.D., LLC to file its opposition to Defendant Medical Mutual of Ohio’s Motion to Dismiss for Lack of Personal Jurisdiction, filed on November 7, 2019 as Document No. 14, be extended by fourteen days, until December 5, 2019, pursuant to L.R. IA 6-1.

This is the first stipulation and request of the Parties to extend time in relation to the subject Motion. The Parties have agreed to stipulate to the proposed extension because counsel for the Parties have agreed, in principal, to a stipulated change of venue to the Northern District of Ohio. However, counsel for defendant Medical Mutual of Ohio is currently in the middle of a jury trial, and the Parties will require additional time to finalize the negotiation and submit a stipulation for change of venue to this court.

The Parties agree that this stipulation shall in no way be considered an admission by Medical Mutual of Ohio that any state or Federal court in Nevada has personal jurisdiction over Medical Mutual of Ohio. The Parties further agree that this stipulation cannot and shall not be used as evidence in an attempt to seek the exercise of personal jurisdiction over Medical Mutual of Ohio in the state or Federal courts of Nevada at any point in the future. Medical Mutual of Ohio reserves any and all future right to challenge any attempted exercise of personal jurisdiction by any state or federal court in Nevada. This stipulation is intended by the Parties exclusively to allow the transfer of this action to the Federal Court for the Northern District of Ohio, where personal jurisdiction and venue are proper

IT IS SO STIPULATED.

Dated: November 21, 2019

HUTCHINGS LAW GROUP, LLC

By: 

Mark H. Hutchings, Esq.  
Alexander M. P. Perry, Esq.  
552 E. Charleston Blvd.  
Las Vegas, NV 89104  
Telephone: (702) 660-7700  
*Attorneys for plaintiff*  
*Steven V. Kozmary, M.D., LLC d/b/a*  
*Cleveland Back and Pain Management Center*

Dated: Nov. 21, 2019

FRANTZ WARD LLP

By: /s/ Gregory R. Farkas

Michael E. Smith, Esq.  
Gregory R. Farkas, Esq.  
200 Public Square  
Cleveland, OH 44114  
(216) 515-1660  
*Attorneys pro hac vice for defendant  
Medical Mutual of Ohio*

Dated: Nov. 21, 2019

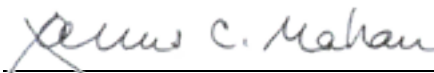
MAUPIN, COX & LEGOY

By: /s/ Rick R. Hsu

Rick R. Hsu, Esq.  
PO Box 30000  
Reno, NV 89520  
(775) 827-2000  
*Attorneys pro hac vice for defendant  
Medical Mutual of Ohio*

**IT IS SO ORDERED.**

Dated November 21, 2019.

  
Hon. James C. Mahan  
U.S. DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I am employed in the County of Clark, State of Nevada. I am over the age of 18 and not a party to the within action. My business address is 552 E. Charleston Blvd., Las Vegas, NV 89104.

On the date set forth below, I served the document(s) described as:

**1. JOINT STIPULATION AND REQUEST FOR EXTENSION OF TIME TO FILE  
OPPOSITION TO DEFENDANT MEDICAL MUTUAL OF OHIO'S MOTION  
TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

on the person(s) listed below:

**Gregory R. Farkas, Esq.**  
**Michael E. Smith, Esq.**  
**FRANTZ WARD**  
200 Public Square  
Cleveland, OH 44114  
*Attorneys pro hac vice for defendant*  
*Medical Mutual of Ohio*

**Rick R. Hsu, Esq.**  
**MAUPIN COX & LEGOY**  
PO Box 30000  
Reno, NV 89520  
*Attorneys for defendant Medical Mutual of Ohio*

  X   (BY ELECTRONIC SERVICE) Pursuant to Local Rule IC 4-1 of the United States District Court for the District of Nevada, I caused the document(s) described above to be transmitted electronically to the addressee(s) as set forth above.

  X   (FEDERAL) I declare that I am employed in the office of an attorney admitted to practice in this Court at whose direction the service was made.

Dated: November 21, 2019

/s/ Helen Buenrostro  
An employee of HUTCHINGS LAW GROUP

**HUTCHINGS LAW GROUP, LLC**

552 E. CHARLESTON BLVD.  
LAS VEGAS, NV 89104